

**Schedule 3**

**PI/WD Claimant Recovery Analysis**

**TEHUM - ILLUSTRATIVE CHanneled PI/WD CLAIM RECOVERIES**

							Nominal Avg. Recoveries per Channeled PI/WD Claim	
Est. Claims Count			TDP Values		Aggregate Claim Value		<i>High Recovery</i> <sup>(1)</sup>	<i>Low Recovery</i> <sup>(2)</sup>
Tier	High Recovery	Low Recovery	Base Matrix Value	Maximum Matrix Value	At Base Matrix Value	At Max. Matrix Value	At Base Matrix Value	At Max. Matrix Value
1	35	39	\$ 1,200,000	\$ 1,597,200	\$ 42,000,000	\$ 62,290,800	\$ 779,073	\$ 377,988
2	33	51	\$ 600,000	\$ 798,600	19,800,000	40,728,600	\$ 389,536	\$ 188,994
3	18	20	\$ 200,000	\$ 266,200	3,600,000	5,324,000	\$ 129,845	\$ 62,998
4	49	58	\$ 50,000	\$ 66,550	2,450,000	3,859,900	\$ 32,461	\$ 15,750
5	24	10	\$ 5,000	\$ 5,000	120,000	50,000	\$ 3,246	\$ 1,183
Total	159	178			\$ 67,970,000	\$ 112,253,300	\$ 277,534	\$ 167,079
Estimated Payment Percentage							64.9%	23.7%

[1] High Recovery assumes that claims that were dismissed or received a defense verdict and claims that did not name Corizon in pre-petition litigation are not compensable. All other claims are assumed compensable. High Recovery categorizes the 15 claims with unknown injuries in Tier 5. All claims are valued using Base Matrix Values.

[2] Low Recovery assumes only claims that were dismissed or received a defense verdict are not compensable. All other claims are assumed compensable. Low Recovery categorizes the 15 claims whose injury is unknown as Tier 2 claims. All claims are valued at the Maximum Matrix Values.

**TEHUM - ILLUSTRATIVE PAYMENT PERCENTAGE ANALYSIS**

(\$ in thousands)

	Nominal	
	High Recovery	Low Recovery
1 Employee Retention Credits, gross	12,980	5,272
2 Causes of Actions Proceeds	1,500	-
3 Insurance and Third-Party Recoveries	10,000	1,000
4 Global Settlement, Including Interest	26,719	26,719
5 <b>Gross Proceeds from Estate Assets</b>	<b>\$ 51,199</b>	<b>\$ 32,991</b>
6 Less: Employee Retention Credits Setoff by Priority Federal Tax Claims	(4,120)	(4,120)
7 Less: Employee Retention Credits - Synergi Administrative Fee (Dkt 723)	(574)	(75)
8 <b>Proceeds Available for PI/WD Trust and GUC Trust</b>	<b>\$ 46,505</b>	<b>\$ 28,796</b>
9 Less: Plan Trusts' Professional Fees	(2,000)	(2,000)
10 Less: Post-Effective Date US Trustee Fees	(377)	(231)
11 <b>Channeled PI/WD Trust Claims Recoveries</b>	<b>\$ 44,128</b>	<b>\$ 26,566</b>
12 Channeled PI/WD Trust Claims	67,970	112,253
13 <b>Estimated Recovery Percentage for Channeled PI/WD Trust Claims</b>	<b>64.9%</b>	<b>23.7%</b>